

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE GROUP, INC. and CHICAGO
20 TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 US BANK NATIONAL ASSOCIATION,
19 Plaintiff,
20 vs.
21 FIDELITY NATIONAL TITLE GROUP,
22 INC. et al.,
23 Defendants.

Case No.: 2:21-CV-00537-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

24 COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and
25 Fidelity National Title Group, Inc. (“FNTG,” collectively “Defendants”) and plaintiff U.S. Bank
26 National Association (“U.S. Bank”), by and through their respective attorneys of record, which
27 hereby agree and stipulate as follows:
28

1 1. On April 1, 2021, U.S. Bank filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;
3 2. On April 2, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);
5 3. On April 27, 2021, U.S. Bank served its complaint on Chicago Title;
6 4. Chicago Title's response to the complaint is currently due on May 18, 2021;
7 5. On May 4, 2021, U.S. Bank served its complaint on FNTG;
8 6. FNTG's response to the complaint is currently due on May 25, 2021;
9 7. Defendants request an extension until June 1, 2021 of their respective deadlines to
10 respond to U.S. Bank's complaint to afford Defendants' counsel additional time to review and
11 respond to U.S. Bank's complaint.

12 8. Counsel for U.S. Bank does not oppose the requested extension;
13 9. This is the first request for an extension made by Defendants, which is made in
14 good faith and not for the purposes of delay.
15 10. This stipulation is entered into without waiving any of Defendants' objections
16 under Fed. R. Civ. P. 12.

17 //
18 //
19 //
20 //
21 //
22 //
23 //
24 //
25 //
26 //
27 //
28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including June 1, 2021.

3 Dated: May 13, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
9 INC. and CHICAGO TITLE INSURANCE
10 COMPANY

11 Dated: May 13, 2021

12 WRIGHT FINLAY & ZAK, LLP

13 By: /s/-Lindsay D. Robbins

14 LINDSAY D. ROBBINS
15 Attorneys for Plaintiff
16 U.S. BANK NATIONAL ASSOCIATION

17 **IT IS SO ORDERED.**

18 Dated May 18, 2021.



19 _____
20 BRENDA WEKSLER
21 UNITED STATES MAGISTRATE JUDGE
22
23
24
25
26
27
28